

EXHIBIT A

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

ENTROPIC COMMUNICATIONS,)
LLC,)
Plaintiff,)
vs.) Civil Action No.
2:22-cv-00125-JRG
CHARTER COMMUNICATIONS,)
INC.,)
Defendant.)

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VIDEO-RECORDED 30(b)(6) DEPOSITION
OF CHARTER COMMUNICATIONS, INC.

BY
ROGER GRAHAM STAFFORD
LONE TREE, COLORADO

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<p>1 APPEARANCES</p> <p>2</p> <p>3</p> <p>4 For Plaintiff: K&L GATES LLP</p> <p>5 By: Nicholas Lenning, Esq.</p> <p>6 925 Fourth Avenue</p> <p>7 Suite 2900</p> <p>8 Seattle, WA 98104</p> <p>9 (206) 623-7580</p> <p>10 nicholas.lenning@klgates.com</p> <p>11</p> <p>12 K&L GATES LLP</p> <p>13 By: Samuel P. Richey, Esq.</p> <p>14 70 W. Madison Street</p> <p>15 Suite 3300</p> <p>16 Chicago, IL 60602</p> <p>17 (312) 372-1121</p> <p>18 samuel.richey@klgates.com</p> <p>19</p> <p>20 For Defendant: ARNOLD & PORTER</p> <p>21 By: Daniel L. Reisner, Esq.</p> <p>22 250 West 55th Street</p> <p>23 New York, NY 10019</p> <p>24 (212) 836-8132</p> <p>25 daniel.reisner@arnoldporter.com</p> <p>Also Present: Davis Baumunk, Videographer</p> <p>Daniel Boglioli, Charter Communications</p>	<p>1 Stafford PMA Downstream EFA 119</p> <p>2 Exhibit 9</p> <p>3</p> <p>4 Stafford Spreadsheet 139</p> <p>5 Exhibit 10</p> <p>6 Stafford PMA Improvements - Strategies 143</p> <p>7 Exhibit 11 Employed for Faster</p> <p>8 Mitigation, Increased</p> <p>9 Capacity, and Cost Savings</p> <p>10</p> <p>11 Stafford Full Scale Employment of PMA 144</p> <p>12 Exhibit 12</p> <p>13 Stafford Spreadsheet 160</p> <p>14 Exhibit 13</p> <p>15</p> <p>16 Stafford Representative Cable FBD 165</p> <p>17 Exhibit 14</p> <p>18 Stafford Data Over Cable Service 167</p> <p>19 Exhibit 15 Interface Specification</p> <p>20 Proactive Network Maintenance</p> <p>21 Stafford PNM Technical Roadmap 169</p> <p>22 Exhibit 16</p> <p>23</p> <p>24 Stafford Network Monitoring Where and 171</p> <p>25 Exhibit 17 How to Monitor a Cable Network</p> <p>Stafford A Comprehensive Case Study of 173</p> <p>Exhibit 18 Proactive Network Maintenance</p> <p>Stafford Tech Talk: DOCSIS3.1 What it 175</p> <p>Exhibit 19 means to Charter Communications</p> <p>Stafford In-Home Topologies as a limit 178</p> <p>Exhibit 20 to Network Capacity Expansion</p>
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<p>1 PROCEEDINGS</p> <p>2</p> <p>3 THE VIDEOGRAPHER: Good morning. We are 09:13:51</p> <p>4 going on the record at 9:13 on June 27, 2023. 09:13:52</p> <p>5 Audio and video recording will continue to 09:13:57</p> <p>6 take place unless all parties agree to go off the 09:13:59</p> <p>7 record. 09:14:02</p> <p>8 This is Media Unit 1 of the video-recorded 09:14:02</p> <p>9 deposition of Roger Stafford, taken by counsel for 09:14:07</p> <p>10 plaintiff, in the matter of Entropic Communications, 09:14:10</p> <p>11 LLC, versus Charter Communications, LLC, filed in the 09:14:14</p> <p>12 United States District Court for the Eastern District 09:14:20</p> <p>13 of Texas, Marshall Division, Case Number 09:14:23</p> <p>14 2:22-cv-00125-JRG. 09:14:25</p> <p>15 The location of this deposition is 09:14:30</p> <p>16 10345 Park Meadows Drive, Lone Tree, Colorado. 09:14:35</p> <p>17 My name is Davis Baumunk, representing 09:14:41</p> <p>18 Veritext Legal Solutions, and I am the videographer. 09:14:44</p> <p>19 The court reporter is Jennifer Smith from the firm 09:14:46</p> <p>20 Veritext Legal Solutions. 09:14:50</p> <p>21 I am not related to any party in this 09:14:51</p> <p>22 action, nor am I financially interested in the 09:14:54</p> <p>23 outcome. 09:14:55</p> <p>24 Counsel will now state their appearances and 09:14:57</p> <p>25 affiliations for the record, beginning with the 09:14:59</p>	<p>1 witness not to reveal any information that you 09:15:56</p> <p>2 learned as a result of communications with counsel. 09:16:00</p> <p>3 To the extent you know anything about the 09:16:03</p> <p>4 case, apart from communications with counsel, you may 09:16:04</p> <p>5 answer. 09:16:07</p> <p>6 THE WITNESS: I just remember it was a -- a 09:16:14</p> <p>7 MoCA-related case. 09:16:18</p> <p>8 BY MR. LENNING: 09:16:18</p> <p>9 Q. Why were you testifying? 09:16:22</p> <p>10 MR. REISNER: Same instructions. 09:16:26</p> <p>11 THE WITNESS: It was a personal deposition 09:16:30</p> <p>12 as a Charter employee. 09:16:32</p> <p>13 BY MR. LENNING: 09:16:32</p> <p>14 Q. Do you know the name of that case? 09:16:37</p> <p>15 A. No, I don't remember. 09:16:40</p> <p>16 Q. Do you remember any of the parties? Aside 09:16:42</p> <p>17 from Charter, I assume? 09:16:45</p> <p>18 A. No, I don't. 09:16:49</p> <p>19 Q. Have you ever testified in court before? 09:16:55</p> <p>20 A. No. No, I've not. 09:17:00</p> <p>21 Q. Okay. I'm going to go over some ground 09:17:04</p> <p>22 rules for the deposition, a lot of which may sound 09:17:08</p> <p>23 familiar from the first time you were deposed, but 09:17:11</p> <p>24 we're going to go over them just so we're all on the 09:17:13</p> <p>25 same page about how we're going to proceed. 09:17:15</p>
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<p>1 noticing attorney. 09:15:01</p> <p>2 MR. LENNING: Nick Lenning with K&L Gates 09:15:03</p> <p>3 for the plaintiff, and with me is Pat Richey, also of 09:15:09</p> <p>4 K&L Gates. 09:15:12</p> <p>5 MR. REISNER: Dan Reisner, Arnold & Porter, 09:15:14</p> <p>6 for the defendant and witness. I'm here with 09:15:14</p> <p>7 in-house counsel for Charter, Dan Boglioli. 09:15:16</p> <p>8 09:15:30</p> <p>9 ROGER GRAHAM STAFFORD, 09:15:30</p> <p>10 having been first duly sworn, 09:15:30</p> <p>11 was examined and testified as follows: 09:15:30</p> <p>12 09:15:31</p> <p>13 EXAMINATION 09:15:31</p> <p>14 BY MR. LENNING: 09:15:31</p> <p>15 Q. Good morning. Could you state your full 09:15:32</p> <p>16 name for the record and spell it. 09:15:35</p> <p>17 A. Yes. Roger, R-o-g-e-r, Graham, G-r-a-h-a-m, 09:15:37</p> <p>18 Stafford, S-t-a-f-f-o-r-d. 09:15:43</p> <p>19 Q. Have you ever had your deposition taken 09:15:47</p> <p>20 before? 09:15:48</p> <p>21 A. Yes. 09:15:49</p> <p>22 Q. How many times? 09:15:50</p> <p>23 A. Once. 09:15:51</p> <p>24 Q. And what was that for? 09:15:53</p> <p>25 MR. REISNER: I'm just going to caution the 09:15:55</p>	<p>1 You understand that your testimony here 09:17:17</p> <p>2 today is under oath? 09:17:19</p> <p>3 A. Yes, I do. 09:17:21</p> <p>4 Q. And you understand that your answers, 09:17:23</p> <p>5 therefore, are subject to the penalties of perjury? 09:17:25</p> <p>6 A. Yes, I do. 09:17:28</p> <p>7 Q. Since the court reporter is transcribing 09:17:29</p> <p>8 your testimony, please say yes or no in response to 09:17:32</p> <p>9 questions, rather than uh-huh or nodding your head. 09:17:36</p> <p>10 Is that fair? 09:17:39</p> <p>11 A. Understood. 09:17:43</p> <p>12 Q. I'd also ask you to wait until I finish my 09:17:44</p> <p>13 question before you answer it. That way the court 09:17:47</p> <p>14 reporter will be able to transcribe both the 09:17:49</p> <p>15 questions and the answers, and we'll have a clear 09:17:52</p> <p>16 transcript. 09:17:54</p> <p>17 Is that fair? 09:17:55</p> <p>18 A. Yes. 09:17:55</p> <p>19 Q. And by that same token, if I interrupt you 09:17:56</p> <p>20 before you've finished your answer, just let me know 09:17:58</p> <p>21 so you can finish. 09:18:00</p> <p>22 A. Understood. 09:18:02</p> <p>23 Q. If at any time you feel like you need a 09:18:04</p> <p>24 break, just let me know. The only limitation to that 09:18:07</p> <p>25 is that, if there is a question pending, I'd ask you 09:18:10</p>

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<p>1 to answer that question before we take a break. 09:18:13</p> <p>2 Do you understand? 09:18:15</p> <p>3 A. Understood. 09:18:16</p> <p>4 Q. If any of my questions are unclear or if you 09:18:18</p> <p>5 don't understand them, please let me know, and I'll 09:18:21</p> <p>6 try to restate the question. 09:18:24</p> <p>7 Is that clear? 09:18:25</p> <p>8 A. Yes. 09:18:26</p> <p>9 Q. And if you answer my question, I'm going to 09:18:28</p> <p>10 assume that you understood it. 09:18:31</p> <p>11 Agreed? 09:18:33</p> <p>12 A. Understood. 09:18:34</p> <p>13 Q. During the deposition, as already happened, 09:18:37</p> <p>14 your counsel may state an objection after I ask a 09:18:41</p> <p>15 question. Those objections are simply to make a 09:18:44</p> <p>16 record so the judge can rule on objections at a later 09:18:47</p> <p>17 time. 09:18:50</p> <p>18 If your counsel objects, you still must 09:18:50</p> <p>19 answer the question unless your counsel specifically 09:18:53</p> <p>20 instructs you not to answer and you decide to follow 09:18:56</p> <p>21 your counsel's instruction. 09:19:00</p> <p>22 Do you understand that? 09:19:02</p> <p>23 A. Understood. 09:19:03</p> <p>24 Q. Is there any reason you cannot provide 09:19:04</p> <p>25 truthful or accurate testimony today? 09:19:06</p>	<p>1 MR. REISNER: You can answer to the extent 09:20:10</p> <p>2 that you need to rely on information that you learned 09:20:14</p> <p>3 as a result of reviewing those documents with respect 09:20:19</p> <p>4 to PMA, which you're designated on to testify on 09:20:24</p> <p>5 behalf of Charter. 09:20:26</p> <p>6 I'm not sure if you -- based on your looking 09:20:31</p> <p>7 at me, I'm not sure if you understand my instruction. 09:20:33</p> <p>8 So let me try to clarify. 09:20:36</p> <p>9 We object to asking for a list of the 09:20:37</p> <p>10 documents that Mr. Stafford was shown by counsel. 09:20:41</p> <p>11 That's work product. 09:20:45</p> <p>12 But to the extent that the witness's 09:20:46</p> <p>13 testimony on behalf of the company, which is with 09:20:50</p> <p>14 respect to PMA and on the other topics that I 09:20:55</p> <p>15 identified in my email yesterday, to the extent you 09:20:59</p> <p>16 are relying on information that you learned from the 09:21:03</p> <p>17 documents in order to testify on behalf of Charter, 09:21:05</p> <p>18 you can answer. 09:21:09</p> <p>19 It may require some follow-up from you to 09:21:11</p> <p>20 make sure the witness understands what you're asking 09:21:13</p> <p>21 for, but we have an objection. 09:21:15</p> <p>22 THE WITNESS: Could you repeat the question, 09:21:20</p> <p>23 please? 09:21:21</p> <p>24 BY MR. LENNING: 09:21:21</p> <p>25 Q. Yeah. 09:21:22</p>
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<p>1 A. No. 09:19:08</p> <p>2 Q. I want to ask you about your preparation for 09:19:12</p> <p>3 today's deposition. 09:19:14</p> <p>4 You are represented here by counsel today? 09:19:16</p> <p>5 A. Yes, I am. 09:19:20</p> <p>6 Q. And what did you do to prepare for your 09:19:21</p> <p>7 deposition today? 09:19:23</p> <p>8 A. I met with counsel yesterday. 09:19:24</p> <p>9 Q. The same counsel that's in the room? 09:19:29</p> <p>10 A. Yes. 09:19:31</p> <p>11 Q. Did you meet with anyone else? 09:19:32</p> <p>12 A. No. 09:19:34</p> <p>13 Q. Were there any other meetings aside from 09:19:39</p> <p>14 yesterday? 09:19:41</p> <p>15 A. No. 09:19:42</p> <p>16 Q. How long was your meeting yesterday? 09:19:45</p> <p>17 A. About eight hours. 09:19:46</p> <p>18 Q. Did you review any documents to prepare for 09:19:50</p> <p>19 today? 09:19:56</p> <p>20 A. Yes. 09:19:57</p> <p>21 Q. Approximately how many hours did you spend 09:19:57</p> <p>22 reviewing documents in preparation for your 09:19:58</p> <p>23 deposition today? 09:20:00</p> <p>24 A. About two or three hours. 09:20:03</p> <p>25 Q. What documents did you look at to prepare? 09:20:07</p>	<p>1 The question is what documents you looked at 09:21:22</p> <p>2 to prepare for today? 09:21:24</p> <p>3 MR. REISNER: Same -- same instruction; same 09:21:28</p> <p>4 objection. 09:21:30</p> <p>5 So I'm concerned that the witness is not 09:21:35</p> <p>6 understanding my objection, and I suggest that either 09:21:37</p> <p>7 we can take a break, if this is what you want to 09:21:43</p> <p>8 pursue, or you can ask, you know, more precise 09:21:46</p> <p>9 questions on this, as, you know, other -- other 09:21:48</p> <p>10 counsel from Entropic have done with prior witnesses. 09:21:53</p> <p>11 BY MR. LENNING: 09:21:53</p> <p>12 Q. Let me ask you this: Did you review -- did 09:22:02</p> <p>13 you do any independent review of documents outside of 09:22:05</p> <p>14 counsel? 09:22:08</p> <p>15 A. No. 09:22:09</p> <p>16 Q. Okay. When you were reviewing documents 09:22:10</p> <p>17 with counsel, was a distinction made between the 09:22:13</p> <p>18 documents you were prepping for to testify on behalf 09:22:17</p> <p>19 of Charter as a 30(b)(6) witness versus other topics? 09:22:20</p> <p>20 A. I'm not sure what a 30(b)(6) witness is. 09:22:26</p> <p>21 Q. Okay. Let's cover that. 09:22:33</p> <p>22 Have you -- do you understand that you've 09:22:37</p> <p>23 been designated by Charter to testify on behalf of 09:22:39</p> <p>24 the company on certain topics? 09:22:42</p> <p>25 A. Yes. Generally, yes. Uh-huh. 09:22:48</p>

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<p>1 Q. And do you understand what those topics are? 09:22:51</p> <p>2 A. The subject of Profile Management 09:22:53</p> <p>3 Application -- 09:22:53</p> <p>4 Q. Okay. 09:23:00</p> <p>5 A. -- is one of those topics. 09:23:01</p> <p>6 Q. Did you review any documents to prepare to 09:23:02</p> <p>7 testify about that? 09:23:05</p> <p>8 MR. REISNER: And I'm going to -- same 09:23:06</p> <p>9 caution. So to the extent that you are actually 09:23:07</p> <p>10 relying on information that you learned from 09:23:13</p> <p>11 reviewing those documents in order to answer 09:23:16</p> <p>12 questions today, you can identify the document. 09:23:19</p> <p>13 But you can't identify the document simply 09:23:22</p> <p>14 because I showed it to you and you looked at it. 09:23:25</p> <p>15 THE WITNESS: So my testimony today will be 09:23:29</p> <p>16 based on information that I already know as -- from 09:23:32</p> <p>17 my history of working on these subjects. 09:23:36</p> <p>18 BY MR. LENNING: 09:23:36</p> <p>19 Q. Okay. So you did not review any documents 09:23:39</p> <p>20 to be able to testify today on behalf of Charter on 09:23:42</p> <p>21 those topics? 09:23:46</p> <p>22 A. That's correct. 09:23:46</p> <p>23 Q. Did you speak with anyone else to prepare 09:24:12</p> <p>24 for today? 09:24:13</p> <p>25 A. No, I did not. 09:24:15</p>	<p>1 Q. And where did you search for documents? 09:26:21</p> <p>2 A. My -- my laptop and some Cloud-based 09:26:24</p> <p>3 archives. 09:26:33</p> <p>4 Q. Are there any potential sources of documents 09:26:35</p> <p>5 that you did not search? 09:26:37</p> <p>6 A. No. 09:26:38</p> <p>7 Q. What documents did you find? 09:26:42</p> <p>8 A. They are PowerPoint presentations, .pdfs, 09:26:46</p> <p>9 perhaps some Excel spreadsheets relating to this -- 09:26:55</p> <p>10 the subject matter I was asked to collect 09:27:01</p> <p>11 documentation on. 09:27:04</p> <p>12 Q. And when was that? 09:27:05</p> <p>13 A. Perhaps about two months ago. 09:27:11</p> <p>14 Q. And you didn't review any of those documents 09:27:15</p> <p>15 again in the recent past to prepare for this? 09:27:17</p> <p>16 MR. REISNER: Same -- same instructions. 09:27:22</p> <p>17 THE WITNESS: No. 09:27:24</p> <p>18 MR. LENNING: Counsel, do you want to list 09:27:35</p> <p>19 the topics that he has been designated on for 09:27:36</p> <p>20 Charter? 09:27:40</p> <p>21 MR. REISNER: Sure. 09:27:40</p> <p>22 MR. LENNING: And we can introduce 09:27:42</p> <p>23 Exhibit 1, if you open it, is the 30(b)(6) notice. 09:27:45</p> <p>24 We can introduce that exhibit. 09:27:51</p> <p>25 (Stafford Exhibit 1 was identified.) 09:28:08</p>
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<p>1 Q. Can you briefly describe what you know about 09:24:24</p> <p>2 this case? 09:24:26</p> <p>3 MR. REISNER: Again, I'm going to caution 09:24:27</p> <p>4 you not to reveal any information you learned as a 09:24:29</p> <p>5 result of communications with counsel. 09:24:34</p> <p>6 So you can answer the questions to the 09:24:35</p> <p>7 extent you have knowledge of this case, apart from 09:24:38</p> <p>8 communications with counsel. 09:24:42</p> <p>9 THE WITNESS: So I really know very little 09:25:17</p> <p>10 about the case, except for that which I've learned 09:25:21</p> <p>11 from counsel. 09:25:25</p> <p>12 BY MR. LENNING: 09:25:25</p> <p>13 Q. Have you discussed this case with anyone at 09:25:29</p> <p>14 Charter, aside from counsel? 09:25:30</p> <p>15 A. No. 09:25:36</p> <p>16 Q. Did you talk with any of your coworkers 09:25:42</p> <p>17 about their depositions in this case? 09:25:43</p> <p>18 A. No. 09:25:45</p> <p>19 Q. Did you search for documents for this 09:25:47</p> <p>20 litigation? 09:25:52</p> <p>21 A. No. Oh, let me correct that. 09:25:53</p> <p>22 So I was asked by counsel to provide 09:25:57</p> <p>23 documentation that I have held or hold that relates 09:26:00</p> <p>24 to the case. 09:26:10</p> <p>25 So I provided that documentation to counsel. 09:26:12</p>	<p>1 THE WITNESS: Okay. I can see this 09:28:08</p> <p>2 document. 09:28:10</p> <p>3 BY MR. LENNING: 09:28:10</p> <p>4 Q. Are you able to open it? 09:28:11</p> <p>5 A. I am able to open it, yes. 09:28:13</p> <p>6 Q. Okay. 09:28:15</p> <p>7 MR. REISNER: So we're designating as we 09:28:16</p> <p>8 communicated with counsel yesterday, Mr. Stafford, 09:28:18</p> <p>9 for every topic, to the extent interpreted to -- to 09:28:25</p> <p>10 relate to PMA. In addition to, we're designating 09:28:31</p> <p>11 Mr. Stafford on Topic 29 for access engineering, and 09:28:35</p> <p>12 we're also designating him on topics 76, 90, 96, and 09:28:40</p> <p>13 89 with respect to cable modems, CMTSs, set-top 09:28:48</p> <p>14 boxes, and PMA, and 98 with respect to Mr. Stafford 09:28:53</p> <p>15 himself. 09:28:58</p> <p>16 BY MR. LENNING: 09:28:58</p> <p>17 Q. Have you seen this document before? 09:28:59</p> <p>18 A. No. 09:29:01</p> <p>19 Q. The topics that he just listed, have you 09:29:04</p> <p>20 read them? 09:29:06</p> <p>21 A. I'm unable to map those numbers that he 09:29:10</p> <p>22 listed to topics. 09:29:12</p> <p>23 Q. What I'm asking you is -- so he just listed 09:29:16</p> <p>24 different topics that are in that document, if you 09:29:19</p> <p>25 scroll down, and the topics have subject matter. 09:29:22</p>

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<p>1 I'm asking have you ever read those before? 09:29:25</p> <p>2 A. Can you tell me where in the document? 09:29:29</p> <p>3 Q. Yeah. Sure. 09:29:33</p> <p>4 If you roll down -- scroll down -- okay. 09:29:33</p> <p>5 Hold on. 09:29:36</p> <p>6 So if you scroll down to A8, it's actually 09:29:55</p> <p>7 Page 11 in the .pdf. 09:30:00</p> <p>8 A. A8, yes. 09:30:05</p> <p>9 Q. Uh-huh. 09:30:08</p> <p>10 Do you see there it says Topic 29? 09:30:09</p> <p>11 A. Yes. 09:30:12</p> <p>12 Q. I believe that's one of the ones your 09:30:12</p> <p>13 counsel just listed that you were designated on. 09:30:14</p> <p>14 Have you ever read that before? 09:30:16</p> <p>15 A. No, I've not. 09:30:18</p> <p>16 Q. So I asked you earlier if you understood 09:30:24</p> <p>17 that you're being designated on certain topics by 09:30:26</p> <p>18 Charter. 09:30:29</p> <p>19 Do you know what those topics are? 09:30:29</p> <p>20 MR. REISNER: Why don't you show the witness 09:30:48</p> <p>21 the particular topic numbers instead of requiring the 09:30:49</p> <p>22 witness to remember. 09:30:52</p> <p>23 THE WITNESS: So I would say generally, no, 09:30:54</p> <p>24 I do not know what the topics are. 09:30:57</p> <p>25 /// 09:30:57</p>	<p>1 that. 09:32:37</p> <p>2 A. Yes, I see that document now. 09:32:37</p> <p>3 Q. Is this a true and accurate copy of your 09:32:43</p> <p>4 LinkedIn profile? 09:32:44</p> <p>5 A. Yes, it appears to be my LinkedIn profile. 09:33:04</p> <p>6 Q. Is the information in here accurate? 09:33:07</p> <p>7 A. Yes, I believe it is. 09:33:22</p> <p>8 Q. Your current position is Principal 09:33:25</p> <p>9 Architect III; correct? 09:33:27</p> <p>10 A. That's correct. 09:33:30</p> <p>11 Q. What is that? 09:33:31</p> <p>12 A. It's a role at Charter, one of the standard 09:33:33</p> <p>13 titles for an architect within the Network Technology 09:33:43</p> <p>14 Group that focuses on product development and access 09:33:51</p> <p>15 architecture, design, planning, and execution. 09:33:55</p> <p>16 Q. Is 3 the most senior? Is there like 09:34:02</p> <p>17 Principal Architect I? Principal Architect II? 09:34:08</p> <p>18 A. That's correct. In terms -- yes. 09:34:09</p> <p>19 There's one other position above, which is 09:34:12</p> <p>20 Distinguished Architect, but, yes, there's Principal 09:34:15</p> <p>21 Architect I, II, and III. 09:34:19</p> <p>22 Q. Okay. So I is less senior than II than III? 09:34:20</p> <p>23 A. Correct. 09:34:23</p> <p>24 Q. What products do you directly work on? 09:34:26</p> <p>25 A. My role is the development of cable modems, 09:34:35</p>
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<p>1 BY MR. LENNING: 09:30:57</p> <p>2 Q. Okay. Okay. Let's go to the next exhibit. 09:30:59</p> <p>3 Can we introduce Number 2. 09:31:15</p> <p>4 (Stafford Exhibit 2 was identified.) 09:31:29</p> <p>5 MR. REISNER: Just let us know when it's up. 09:31:29</p> <p>6 MR. RICHEY: It's up. 09:31:30</p> <p>7 BY MR. LENNING: 09:31:30</p> <p>8 Q. It should be up now. You might have to 09:31:35</p> <p>9 refresh. 09:31:36</p> <p>10 Oh, wait, no. No. I'm talking about the 09:31:46</p> <p>11 LinkedIn profile. Sorry. 09:31:49</p> <p>12 MR. REISNER: Just so the record's clear, is 09:31:55</p> <p>13 Exhibit 2 being marked and put in the record or not? 09:31:57</p> <p>14 MR. LENNING: Oh, sure. We can, just so 09:32:00</p> <p>15 it's in there. Exhibit 2 is the -- just the 09:32:01</p> <p>16 amended -- it's already on there anyway. Is the 09:32:05</p> <p>17 amended 30(b)(1) notice for Mr. Stafford. 09:32:08</p> <p>18 BY MR. LENNING: 09:32:08</p> <p>19 Q. Have you seen that document? 09:32:12</p> <p>20 A. No, I've not. 09:32:13</p> <p>21 Q. Okay. You should be able to go now to 09:32:14</p> <p>22 Exhibit 3 when it's loaded. 09:32:17</p> <p>23 (Stafford Exhibit 3 was identified.) 09:32:35</p> <p>24 BY MR. LENNING: 09:32:35</p> <p>25 Q. There we go. Let me know when you've got 09:32:35</p>	<p>1 and some of the components around access architecture 09:34:46</p> <p>2 that is the physical layer, design of the physical 09:34:51</p> <p>3 layer between our infrastructure and copper 09:34:57</p> <p>4 infrastructure and customers' homes, known as access 09:35:00</p> <p>5 architecture. 09:35:04</p> <p>6 And I work on -- on some tools around 09:35:05</p> <p>7 access architecture to assist our operations team. 09:35:12</p> <p>8 Most of it is around technical design. 09:35:21</p> <p>9 Q. Does that describe the Network Technology 09:35:25</p> <p>10 Group generally, or are there other teams that are 09:35:28</p> <p>11 working on different things than what you just 09:35:31</p> <p>12 described? 09:35:33</p> <p>13 A. There are certainly many teams covering 09:35:33</p> <p>14 different parts of the infrastructure, such as 09:35:36</p> <p>15 optical, DOCSIS, wireless, different disciplines 09:35:38</p> <p>16 within those groups. There are many teams, yes. 09:35:46</p> <p>17 Q. Is that -- so my next question was going to 09:35:49</p> <p>18 be if you can describe the structure of that 09:35:52</p> <p>19 department, the network technology. Is that what you 09:35:54</p> <p>20 just gave, basically those different groups you just 09:35:58</p> <p>21 gave? 09:36:01</p> <p>22 A. Uh-huh. Yes. 09:36:02</p> <p>23 Q. What is the group you're in called? 09:36:03</p> <p>24 A. I'm within what is just generally known as 09:36:04</p> <p>25 Access Architecture. 09:36:07</p>

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